THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

DR. VANESSA GARCIA,)
Plaintiff,)
v.))
) Case No. 3:18-cv-00814
THE METROPOLITAN) JURY DEMANDED
GOVERNMENT OF NASHVILLE AND)
DAVIDSON COUNTY, TENNESSEE,) Judge Campbell
) Magistrate Newbern
Defendant.)

DEFENDANT'S WITNESS LIST

Defendant Metropolitan Government of Nashville and Davidson County, Tennessee ("Defendant" or "Metro Schools") hereby provides notice, pursuant to Federal Rule of Civil Procedure 26(a)(3), that it expects to call the following witnesses to testify at trial:

- Jennifer Bell c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201
- Barry Booker c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201
- 3. Moreno Carrsasco 1400 Henlow Drive Ormond Beach, FL 32174 (240) 277-5938
- 4. Hank Clay c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201
- 5. Amy Frogge c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

6. Chris Henson

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

7. Dr. Shawn Joseph

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

8. David Kovach

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

9. Kyla Krengel

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

10. Scott Lindsey

1408 Riverbrook Drive Hermitage, TN 37073 (615) 693-4556

11. Craig Ott

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

12. Sharon Pertiller

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

13. Dennis Queen

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

14. Terry Shrader

Upper School Head/Principal Davidson Academy 1414 W. Old Hickory Blvd Nashville, TN 37207 (615) 860-5326 (615) 566-9955

15. Lisa Spencer

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

16. Jill Speering

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

17. Dr. Sonia Stewart

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

18. Deborah Story

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

19. Michael Taylor

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

20. Bill Warren

1817 Apple Ridge Circle Nashville, TN 37211 (615) 580-8691

21. Dr. Rebecca Welch

66 Nance Lane Nashville, TN 37210

22. Antoinette Williams

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

23. Aimee Wyatt

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

24. Frank Young

c/o Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, 211 Commerce Street, Suite 800, Nashville, TN 37201

Defendant may call the following witnesses to testify at trial if the need arises:

1. Plaintiff

Defendant reserves the right to call rebuttal and impeachment witnesses in accordance with Federal Rule of Civil Procedure 26(a)(3).

Respectfully submitted,

s/ Charles K. Grant

Charles K. Grant, BPR No. 17081 Sharonda Fancher, (admitted pro hac vice) BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC Baker Donelson Center 211 Commerce Street, Suite 800 Nashville, TN 37201

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Attorneys for Defendant Metropolitan Government of Nashville and Davidson County, Tennessee

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2019, a copy of the foregoing *Defendant's Witness List* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

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s/ Charles K. Grant Charles K. Grant